

Valdez, Heather

From: Johnson, Steffan
Sent: Thursday, December 12, 2013 9:07 AM
To: Hedgpeth, Zach; Valdez, Heather
Cc: Gallagher, Shirin; Silver, Meg; Keenan, John; Downey, Scott; Pavitt, John; Jones, Toni
Subject: RE: note on Pogo SO2 emissions

Categories: Pogo FOIA

Zach,

Very good point. I, too, am not aware of a control device (DSI, spray dryer, or other FGD) capable of 95%+ removal for SOx. A wet scrubber with caustic reagent may get close, but the byproduct stream would be substantial and in Alaska they would have the problem of trying to keep the scrubber solution in a liquid phase.

Stef

From: Hedgpeth, Zach
Sent: Thursday, December 12, 2013 11:53 AM
To: Valdez, Heather
Cc: Gallagher, Shirin; Silver, Meg; Keenan, John; Downey, Scott; Johnson, Steffan; Pavitt, John; Jones, Toni
Subject: note on Pogo SO2 emissions

Heather et al,

I have by no means completed my review of the test report recently submitted, but one note might be relevant for our discussions with Pogo later today.

Based on the 3-run average emission rate measured during the recent testing, the SO2 emission concentration from Pogo's incinerator would have to be reduced by 95.6% just to achieve the standard. The limit is 1.2 ppm_{dv}, while Pogo's 3-run average was 27.2 ppm_{dv}. This level of SO2 emission reduction is a very tall order, even for the most robust wet FGD system I've ever seen, and is not likely to be achievable with dry or spray-dry scrubbing.

Although not encouraging, it seemed best for folks to be aware of this prior to the meeting.

See you at 10,
Zach

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